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PROPOSED COUNSEL TO DEBTORS
REAGOR-DYKES MOTORS, LP *et al.*

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

IN RE:

REAGOR-DYKES MOTORS, LP, *et al.*¹

Debtor.

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Case No. 18-50214-rlj-11
Jointly Administered

NOTICE OF AGENDA FOR HEARING
SCHEDULED FOR SEPTEMBER 18, 2018, AT 10:00 A.M. BEFORE THE
HONORABLE ROBERT L. JONES AT THE UNITED STATES BANKRUPTCY
COURT, LOCATED AT 1205 TEXAS AVE., RM 306, LUBBOCK, TEXAS 79401

This agenda sets forth items in the order the Debtors intend to present to the Court.
The Status of each is set forth below.

1. *Debtors' Joint Emergency Motion for Authority to Use Cash Collateral* [Docket No. 8] filed by the Debtors.

Status: Ford Motor Credit Company has agreed to the Debtors' proposed cash-collateral budget on all items except rent. The parties will argue that line item to the Court. The Debtors propose to use cash collateral through 10/18. Ford will only agree for the Debtors to use cash collateral through 10/4.

¹ The Debtors are Reagor-Dykes Imports, LP (Case No. 18-50215), Reagor-Dykes Amarillo (Case No. 18-50216), Reagor-Dykes Auto Company, LP (Case No. 18-50217), Reagor-Dykes Plainview, LP (Case No. 18-50218), and Reagor-Dykes Floydada, LP (Case No. 18-50219).

2. *Ford Motor Credit Company LLC's Motion for Relief from the Automatic Stay* [Docket No. 46] filed by Ford Motor Credit Company, LLC.

Status: Ford Motor Credit Company has agreed to pass Docket No. 46 until the next cash-collateral hearing.

3. *Motion to Appoint Chapter 11 Trustee Pursuant to 11 U.S.C. § 1104(a) and (b)* [Docket No. 47] filed by Ford Motor Credit Company, LLC.

Status: Ford Motor Credit Company has agreed to pass Docket No. 47 until the next cash-collateral hearing.

4. *Motion for Relief from Automatic Stay* filed by International Bank of Commerce [Docket No. 196]

- a. *International Bank of Commerce's Motion for Expedited Hearing on Motion for Relief from Automatic Stay* [Docket No. 197]; and
- b. *Order for Expedited Hearing on International Bank of Commerce's Motion for Relief from Automatic Stay* [Docket No. 206].

Status: The Debtors and International Bank of Commerce have agreed to an interim solution. Ford Motor Credit Company will not agree to the Debtors' use of cash collateral to pay this interim solution. The parties will argue this point as part of item 1.

5. *Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Overbid Protections; and (C) Form and Manner of Notices* [Docket No. 222] filed by Debtors.

- a. **Objection:** *Objection of Gulf States Toyota, Inc. to the Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Overbid Protections; and (C) Form and Manner of Notices* [Docket No. 252].
- b. **Objection:** Ford Motor Credit Company's Limited Objection to the Debtors' *Motion for Entry of an Order (I) Authorizing and Approving: (A) Bid Procedures; (B) Stalking Horse Bidder and Overbid Protections; and (C) Form and Manner of Notices* [Docket No. 257].

Status: Docket No. 252 has been resolved. Docket No. 257 will go forward on two limited points.

6. *Unopposed Motion for Order Extending Time to File Schedules of Assets and Liabilities and Statement of Financial Affairs* [Docket No. 224] filed by Debtors.

Status: There were no objections filed to Docket No. 224. Further, the United States Trustee's office has consented to the relief requested. If the Court requires a hearing, this matter will go forward.

The Debtors reserve the right to amend this Notice of Agenda as appropriate.

NOTICE

The pleadings in these cases and supporting papers are available on the Court's website at: ecf.txnb.uscourts.gov. You may also request a copy of any pleading from counsel for the Debtors at the following address: Foley Gardere, Foley & Lardner LLP, 2021 McKinney Avenue, Suite 1600, Dallas, Texas 75201 (acordero@foley.com).

DATED: September 17, 2018

Respectfully submitted by:

/s/ Marcus A. Helt

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